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**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

TIMOTHY CALABRESE,
Plaintiff,
vs.
KILIGO KIJAKAZI,
Acting Commissioner of Social Security,
Defendant.

) Case No.: 2:23-cv-00386-VCF
)
) **UNOPPOSED MOTION FOR EXTENSION OF**
) **TIME TO FILE CERTIFIED**
) **ADMINISTRATIVE RECORD AND ANSWER**
) **(*FIRST REQUEST*)**
)
)

Defendant, Kilolo Kijakazi, Acting Commissioner of Social Security (the “Commissioner”), by and through her undersigned attorneys, hereby moves for a 30-day extension of time to file the Certified Administrative Record (CAR) and answer to Plaintiff’s Complaint. The CAR and answer to Plaintiff’s Complaint are due to be filed by May 15, 2023. This is Defendant’s first request for an extension of time. Defendant requests this extension because after an initial review of the CAR, I would like to further review the record and determine the appropriate response.

For these reasons, Defendant requests an extension in which to respond to the Complaint until June 15, 2023. On May 12, 2023, the undersigned conferred with Plaintiff's counsel, who has no opposition to the requested extension.

It is therefore respectfully requested that Defendant be granted an extension of time to file the appropriate response to Plaintiff's Complaint, through and including June 15, 2023.

Dated: May 12, 2023

BLAINE T. WELSH
United States Attorney

/s/ L. Jamala Edwards
L. JAMALA EDWARDS
Special Assistant United States Attorney

IT IS SO ORDERED:


UNITED STATES MAGISTRATE JUDGE

DATED: 5-12-2023

CERTIFICATE OF SERVICE

I, the undersigned, am a citizen of the United States and am at least eighteen years of age. My business address is Social Security Administration, Office of the General Counsel 6401 Security Boulevard Baltimore, MD 21235. I am not a party to the above-entitled action. On the date set forth below, I caused service of **UNOPPOSED MOTION FOR EXTENSION OF TIME TO FILE CERTIFIED ADMINISTRATIVE RECORD AND ANSWER** on the following parties by electronically filing the foregoing with the Clerk of the District Court using its ECF System, which provides electronic notice of the filing:

Jenn Dunn
jdunn@dunnlawfirmllc.com
Attorney for Plaintiff

I declare under penalty of perjury that the foregoing is true and correct.

Dated: May 12, 2023

/s/ L. Jamala Edwards
L. JAMALA EDWARDS
Special Assistant United States Attorney